

# **Exhibit K**

# LAWRENCE & BUNDY LLC

1180 West Peachtree Street, Suite 1650  
Atlanta, Georgia 30309  
(404) 400-3350

8115 Maple Lawn Blvd., Suite 350  
Fulton, Maryland 20759  
(240) 786-4998

**Allegra J. Lawrence-Hardy**  
**Direct Line: (404) 400-3340**  
[allegra.lawrence-hardy@lawrencebundy.com](mailto:allegra.lawrence-hardy@lawrencebundy.com)

December 14, 2019

VIA EMAIL

Josh Belinfante, Esq.  
Robbins Ross Alloy Belinfante & Littlefield, LLC  
500 14th Street  
Atlanta, Georgia 30318  
[jbelinfante@robbinsfirm.com](mailto:jbelinfante@robbinsfirm.com)

Re: *Fair Fight Action v. Raffensperger*, Civil Action No. 1:18-CV-05391-SCJ  
United States District Court, Northern District of Georgia

Dear Josh:

As I referenced during our call yesterday, on Wednesday, December 11, Plaintiffs learned for the first time that Defendants are imminently planning to purge registered voters from the voter rolls based on voter inactivity notwithstanding the pendency of the above-referenced matter. Specifically, Secretary of State General Counsel Ryan Germany testified:

Mr. Germany: That notice [the "secondary notice"] has been sent out. When it's sent out, it starts a 40-day clock for getting it returned. And I believe the 40-day clock is going to expire sometime next week.

Q. And when will these people who did not respond to the notice -- when will they be moved from inactive to canceled?

Mr. Germany: I believe it's December 16th, but it's a date around there.

\* \* \*

Q. I want to know whether it's December, January, or next June.

Mr. Germany: I think it happens next week.

■ Atlanta, Georgia ■

■ Washington, D.C. ■

[www.lawrencebundy.com](http://www.lawrencebundy.com)

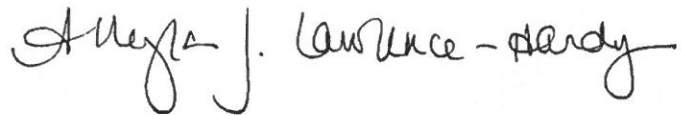
Letter to Josh Belinfante, Esq.  
December 14, 2019  
Page 2

(Germany 12/11/2019 Dep., at 38:8-20).

As you are aware, Plaintiffs' lawsuit challenges whether the State's "use it or lose it" process complies with applicable law. Accordingly, Plaintiffs request that, as Defendants have done in the past,<sup>1</sup> Defendants delay any cancellations or modifications to the status of registered voters based on inactivity until after the Court's resolution of Plaintiffs' claims.

Please let us know by noon on Monday, December 16, whether Defendants will agree to stay the purging process during the pendency of Plaintiffs' challenge. If Defendants do not agree, Plaintiffs may be forced to seek appropriate relief from the Court.

Very truly yours,

A handwritten signature in black ink that reads "Allegra J. Lawrence-Hardy". The signature is written in a cursive, flowing style.

Allegra J. Lawrence-Hardy

cc: Brian E. Lake, Esq. (via email)  
Carey A. Miller, Esq. (via email)  
Vincent R. Russo, Jr., Esq. (via email)  
Andrew Swindle, Esq. (via email)  
Bryan P. Tyson, Esq. (via email)  
Bryan Jacoutot, Esq. (via email)  
Leslie J. Bryan, Esq. (via email)  
Maia Cogen, Esq. (via email)  
Suzanne Williams, Esq. (via email)  
Dara Lindenbaum, Esq. (via email)  
Elizabeth Tanis, Esq. (via email)  
John Chandler, Esq. (via email)  
Kurt G. Kastorf, Esq. (via email)  
Matthew G. Kaiser, Esq. (via email)  
Sarah Fink, Esq. (via email)  
Scott S. Bernstein, Esq. (via email)  
Norman Anderson, Esq. (via email)  
Andrew D. Herman, Esq. (via email)  
Nina Gupta, Esq. (via email)  
Kali Brace, Esq. (via email)

---

<sup>1</sup> There is precedent for not conducting a purge due to pending litigation. *See* Germany 12/11/2019 Dep., at 57:15-21.

Letter to Josh Belinfante, Esq.  
December 14, 2019  
Page 3

Jeremy H. Ershow, Esq. (via email)  
Von DuBose, Esq. (via email)